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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN FRANCISCO DIVISION**
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12 IN RE: UBER TECHNOLOGIES, INC.,
13 PASSENGER SEXUAL ASSAULT
14 LITIGATION

Case No. 3:23-md-03084-CRB

15 This Document Relates to:

16
17 *Jaylynn Dean v. Uber Technologies, Inc.,*
18 *et al.*, No. 3:23-cv-06708

**DECLARATION OF SARAH R. LONDON IN
SUPPORT OF PLAINTIFFS’
ADMINISTRATIVE MOTION TO EXTEND
DEADLINE TO OPPOSE UBER’S MOTION
FOR (1) POSTPONEMENT OF FIRST
BELLWETHER TRIAL AND RELATED
RELIEF, AND (2) THIRD-PARTY SUBPOENA
REGARDING MISLEADING AD CAMPAIGN**

19 Judge: Hon. Charles R. Breyer
20 Courtroom: 6 – 17 Floor
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DECLARATION OF SARAH R. LONDON
Case No. 3:23-md-03084-CRB

1 I, Sarah R. London, declare:

2 1. I am an attorney in the law firm of Girard Sharp LLP, appointed Co-Lead and
3 Liaison Counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of
4 the State Bar of California and am admitted to practice before this Court. I make this declaration
5 based on my own personal knowledge. If called upon to testify, I could and would testify
6 competently to the truth of the matters stated herein.

7 2. On December 2, Uber filed a Motion for (1) Postponement of First Bellwether Trial
8 and Related Relief, and (2) Third-Party Subpoena Regarding Misleading Ad Campaign (ECF No.
9 4498) (the “Motion”).

10 3. The Motion seeks, among other things, to effect a prior restraint on an advocacy
11 group’s publication of a political advertising campaign, referred to as the Every 8 Minutes
12 campaign, and discovery concerning that advocacy group’s internal speech concerning the
13 campaign.

14 4. Uber notes that the Every 8 Minutes campaign was paid for by Consumer Attorneys
15 of California Initiative Defense Political Action Committee, which is not affiliated with any
16 bellwether Plaintiff.

17 5. No one on MDL Leadership sits on the Consumer Attorneys Political Action
18 Committee Board of Trustees, the body that approved, directed, and runs the Every 8 Minutes
19 campaign.

20 6. CAOC was not served with the Motion. I am informed that CAOC only recently
21 retained counsel and is evaluating whether and how to respond to the Motion.

22 7. On December 15, my colleague and I contacted Uber’s counsel to request that Uber
23 stipulate to an extension of the deadline to oppose the Motion. We have not received a response
24 from Uber’s counsel as of the time of this filing.

25 8. The Court has extended other deadlines in this MDL but none relate to this Motion.

26 9. Plaintiffs do not seek extension of the hearing date for the Motion or any other
27 deadlines related to the trial in Ms. Dean’s case.

28 I declare under penalty of perjury that the foregoing is true and correct.

Executed this 15th day of December, 2025 in Muskogee, Oklahoma

/s/ Sarah R. London

Sarah R. London

FILER'S ATTESTATION

I, Andrew Kaufman, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: December 15, 2025

/s/ Andrew Kaufman

Andrew Kaufman